

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 vs.) CRIMINAL NO.: 00-54
)
 DAVID MAIS)

**MOTION FOR ENLARGEMENT OF TIME
WITHIN WHICH TO FILE PRETRIAL MOTIONS**

AND NOW, comes the defendant, David Mais, by his attorney, John A. Knorr, Esquire, and JOHN KNORR LAW, and makes the within Motion for Enlargement of Time Within Which to File Pretrial Motions and in support thereof, avers as follows:

1. The defendant has been indicted at the above number and term and charged with violation of the drug laws of the United States of America.

2. The defendant was arraigned on these charges on June 23, 2006, and the case has been assigned to Judge Cercone.

3. Pretrial motions are due to be filed on or before July 18, 2006.

4. The defense has received a substantial amount of supplemental Rule 16 material which raise complex issues of law and fact which will require additional time to evaluate and prepare pretrial motions.

5. Assistant United States Attorney, Gregory Nescott,
consents to the within Motion.

WHEREFORE, it is respectfully requested that this Honorable Court enlarge the time for filing pretrial motions by thirty days or until August 17, 2006.

Respectfully submitted,

s/John A. Knorr

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